Elliott
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TX-03361

30 MAY 1980

Mr. Max E. Sears
Plant Manager
Jefferson Chemical
Company, Inc.
P. O. Box 847
Port Neches, Texas 77651

TXD008 276 846

Dear Mr. Sears:

The Environmental Protection Agency, National Enforcement Investigations Center (NEIC) is planning on conducting an inspection of your facility in November 1980.

Texaco Chem Co-Port Neches

The inspection team will be under the direction of Mr. E. J. Struzeski or Mr. A. E. Franzen, who will confirm the details of the inspections with you. The purpose of the inspection is (1) to assess the impact of wastewater discharges, air emissions, and solid and liquid waste disposal practices on the surrounding environment and (2) to evaluate current compliance status with the applicable statutes, regulations, and with permits issued to your facility. The inspectors will observe process operations; evaluate monitoring practices, equipment and sites; examine waste management practices; review related records; and collect environmental samples which may include air, water, waste, and/or soil samples. In addition, the inspectors may wish to take photographs of selected subjects. They will be interested in any phase of your operation which could lead to pollution. Accordingly, facility personnel should follow their usual practices and procedures for production and monitoring. Prior to their arrival, the inspection team will require certain information. Accordingly, we ask that the following materials be submitted to NEIC. Even though certain documents may have been previously submitted to the EPA Effluent Guidelines Division or to other EPA programs, the NEIC inspection team will require a copy of the same data to expedite the survey and to ensure that the NEIC analysis is both factual and comprehensive.

The inspection authority, as well as the authority for obtaining requested information, is contained in one or more of the following statutes:

Section 114 of the Clean Air Act (42 USC 1957)

Section 308 of the Federal Water Pollution Control Act (3 USC 1318)

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6AEW Stiebing
6AEA Edlund
6AEG Elliott

Sections 8 and 9 of the Federal Insecticide, Fungicide and Rodenticide Act (7 USC 136)

Section 3007 of the Resources Conservation and Recovery Act (42 USC 6927)

Section 1445 of the Safe Drinking Water Act (42 USC 300)

Section 11 of the Toxic Substances Control Act (15 USC 2610)

Please provide copies of the following data, plans, specifications, information requested, etc., for EPA's retention within 20 days of receipt of this letter.

1. Diagrams, maps, sketches, or drawings of the plant property indicating the locations of all outfalls, process areas, wastewater treatment facilities, air pollution control equipment and emission points, springs and groundwater supplies, drinking water supply wells and treatment facilities, surface water diversions or channeling of runoff to the receiving waters, and solid and liquid waste treatment, storage, or disposal sites including injection wells.

2. Unit process flow diagrams showing where all wastewaters, air emissions and solid and liquid wastes originate, the approximate flow from each effluent or emission point source and the composition of each flow or waste material.

3. Information regarding all wastewater treatment, solid and liquid waste treatment and air pollution control equipment currently in operation or planned, including but not limited to drawings, design criteria, dimensions of equipment, treatment efficiencies, sampling data (e.g., influent and effluent characterization), operating and maintenance problems, frequency rates, and remedies, etc.

4. An inventory of all solids and sludges, removed by all waste, wastewater treatment facilities, and air pollution control equipment. Such information shall include the identity, quantity, method of transfer, intermediate and ultimate location of refuse or disposal, method of disposal, and any cost recovery resulting from sales of recovered solids.

5. An inventory of air emissions. Such information shall identify the emission points on a process flow diagram and indicate the basis for the emissions estimates, including control equipment efficiencies, fuel rates, etc.

6. A description of any blowdown systems, including the disposition of the off-gases. For each flow include type, height and diameter of stack (ft), rated capacity (10^6 BTU/hr and tons/hr) of flared material, amount of material flared, percent of time flare is used, where flared material originates (i.e., include a block diagram to show all units that could send material to the flare), type of flare ignition device at top of stack, and sulfur content of flared material (% by weight).

7. A listing of all hydrocarbon storage tanks greater than 1,000 gallon capacity including crude oil and fuel oil tanks. Provide for each tank the tank number, tank capacity, type of tank (fixed, floating roof, pressure), material stored, molecular weight of material stored (average molecular weight for mixtures), average daily throughput, true vapor pressure at average storage temperature (psia at °F), control pressure, type of vapor loss control and average efficiency.

8. An inventory of all solid and liquid wastes disposed of either on- or off-site. Such information shall include descriptions of the materials and quantities disposed of on-site or off-site within the past three years, identification of any priority pollutants* disposed of and their probable location, description of any ground water monitoring wells, data from analysis of the well contents (especially priority pollutant data), etc.

9. The method(s) by which wastewater flows are determined, e.g., the type of measurement device used and the procedure for calibration. Where applicable, also provide integrator factors and chart factors for all flow recording equipment.

10. A list and description of the devices or methods used for monitor water and air pollution control equipment, including, but not limited to manufacturers and model numbers of the sensing device transmitters and recorders; parameters measured, calibration procedures, integrator or chart factors, etc. Indicate normal operating data for these devices.

11. Copies of all air pollution source tests conducted by or for the Company over the past three years.

12. "As-built" plans or sketches showing all dimensions of stacks including sampling port locations. Identify each stack as to the types and source of pollutants. If sampling ports are located in the breaching, identify duct sizes and port locations.

13. The Company definition of its production day (e.g., 8 a.m. to 8 a.m., midnight to midnight).

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* NRDC v. Train, 6ELR 20588; 8ERC 2120; Table 1 of Committee Pring 95-30; Federal Register, January 31, 1978, (43 FR 4108)

14. Information regarding the minimum, maximum, and average tonage or volume of each raw material intermediate, products, and byproducts used per day, on a monthly basis, for the past year.

15. A copy of your Spill Prevention, Control and Countermeasure Plan.

Pursuant to regulations appearing at 40 C.F.R., Part 2, Subpart B (41 Fed. Reg. 36906, September 1, 1976), you are entitled to assert a business confidentiality claim covering any part of the submitted information which is not emissions data, effluent data, or contaminants in drinking water, as defined in 40 C.F.R. §§2.301(a)(2), 2.302(a)(2)(1), and 2.304(a)(2), respectively. Unless such a confidentiality claim is asserted at the time requested information is submitted, EPA may make this information available to the public without further notice to you.

Information subject to a business confidentiality claim may be made available to the public only to the extent set forth in the above-cited regulations. Any such claim for confidentiality must conform to the requirements set forth in 40 C.F.R. 2.203(b).

If you have any questions, please call Mr. E. J. Struzeski at (303) 234-4708 or Mr. A. E. Franzen at (303) 234-4658.

Sincerely,

ORIGINAL SIGNED BY

Diana Dutton
Director
Enforcement Division (6AE)

bcc: Elliott (6AEG)
Edlund (6ASA)
Ferguson (6AEWC)
M. Smith (6ASA)
NPDES File
NEIC - Denver